Bonita Lavelle/EPR/R8/USEPA/US
04/03/2009 05:15 PM

To "Marriam, Robert R." <Robert.R.Marriam@grace.com>
cc john.d.garr@mwhglobal.com, "Finke, Richard" <Richard.Finke@grace.com>, "Medler, Robert J." <Robert.J.Medler@grace.com>, "Corcoran, William "
bcc
Subject Re: Review of the Draft ABS Proposal

Dear Bob,

Thank you for your comments. I think we had a good discussion about Remedium's concerns last Wednesday. I remain optimistic that we can resolve these issues either at the level of the final SAP or as a result of performing a "dry run" of the ABS program and modifying the SAP if necessary to improve the implementability, cost effectiveness, and technical approach.

Please see EPA's responses to your comments in red below.

If you'd like to discuss any of these further, we're always willing to arrange a conference call or meeting.

Sincerely,

Bonnie Lavelle
Remedial Project Manager
Libby Asbestos Superfund Site, OU3
EPA Region 8
1595 Wynkoop Street
8EPR-SR
Denver, CO 80202-1129

(303) 312-6579
Fax (303) 312-7151

"Marriam, Robert R." <Robert.R.Marriam@grace.com>

"Marriam, Robert R." <Robert.R.Marriam@grace.com>
04/02/2009 10:16 AM

To Bonita Lavelle/EPR/R8/USEPA/US@EPA, <john.d.garr@mwhglobal.com>
cc "Medler, Robert J." <Robert.J.Medler@grace.com>, "Corcoran, William " <William.Corcoran@grace.com>, "Finke, Richard" <Richard.Finke@grace.com>
Subject Review of the Draft ABS Proposal

Bonnie,

The following are the comments prepared by Remedium Group with regards to the Draft ABS activities, OU-3.

1. Please included in the SAP the need for a "dry run" on the site under field conditions to establish the feasibility of the proposed actions as listed in this section of the Draft SAP.

EPA has given direction to SRC to include a dry run in the scope of the ABS program to be described in the final Phase III Sampling and Analysis Plan. The text will also indicate that modifications to the SAP may be made as necessary after the dry run has been completed and evaluated. We understand that if the dry run results in additions such as more pumps, more samples, longer scenarios, and/or modified analytical requirements, the cost may increase. EPA is willing to consider reducing the number of ABS stations if necessary to control costs while improving the technical feasibility. We can discuss all options

after the dry run is complete.

2. The number of samples to be taken per location should be specified as 10, and not as 10-11.

We will ensure that the sampling design section (3.1.5) is consistent with the DQO section of the Phase III SAP (3.1.4) and will specify 10 samples for the Phase III program. However, as stated in the DQO section, if the variability of the analytical results is high and/or the observed mean concentrations are close to decision thresholds, additional sampling may be needed to support risk management decisions. We won't know this until the data are available from the Phase III program.

3. The phantom "Tech Memo 11" supposedly states that there is little or no difference in the fiber count of Libby amphiboles when using the direct or indirect preparation method for analysis. This is an important issue to W. R. Grace. They feel strongly about not using an indirect prep method because of the distorted numbers of actual fibers found in the sample. Remedium will not be comfortable undertaking this major and costly sampling event without a clear understanding that the air filters will not be overloaded and can be analyzed using a direct prep method.

Understood. I'm attempting to locate Tech Memo 11 and will certainly provide a copy to Remedium and MDEQ. I obviously haven't reviewed it yet either. I hope W.R. Grace will remain open to the information presented in the Tech Memo.

4. The requirement that each field team have a GPS instrument that automatically records their location every minute makes no sense at all. The location of the specific activity can and should be reported as well as the start and stop points on the ATV rides. Unnecessary and unreasonable requirements for field teams should not be included in the SAP.

What we have in mind is a wrist device that you simply turn on at the beginning of the event and off at the end and it captures the route taken by the person wearing it. The information can be downloaded at the end of the day. The device we have in mind is capable of storing multiple routes. It seems to us a simple way to develop a record to demonstrate that the ABS events were performed at a variety of locations. We're sensitive to the number of requirements placed on the field teams but I think you may misunderstand what we're looking for here. Let's talk.

One example GPS unit is made by Garmin (Forerunner 205) and can be found on the following website. Cost is $200. There are likely others.

https://buy.garmin.com/shop/shop.do?cID=142&pID=348

5. It is proposed that the calibration of the personal air pumps be carried out using the BIOS Defender model 510 instrument rather than a Rotometer because of the greater accuracy and ease of use.

We'll consider this change

6. It is not believed to be necessary that the flow rates of the individual air pumps be checked several times during one 3-hour ABS script. Calibration before and after using the equipment should be adequate and the pump equipment should not fluctuate in this short period of time.

This recommendation was made by CDM based on their experience performing ABS in Libby

Please advise if there are any questions.

Robert R. Marriam, Consultant
Remedium Group, Inc.
6401 Poplar Ave., Suite 301
Memphis, TN 38119
901-820-2023 Office
901-277-9031 Cell